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February 16, 2021

### Via ECF

Hon. James B. Clark, III, U.S.M.J.  
United States District Court  
District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

**Re: Collick et al. v. William Paterson University et al.**  
**Docket No. 16-471 (KM)**

Dear Judge Clark:

As Your Honor knows, this office represents plaintiffs in the above matter. Currently pending before the Court is defendants' motion for summary judgment as to all issues. **With the consent of defendants' counsel**, plaintiffs respectfully request that the Court adjust the briefing schedule as follows:

- Plaintiffs' opposition to defendants' motion shall be filed and served on or before **March 1, 2021** (extended from February 19, 2021);
- Defendants' reply shall be filed and served on or before **April 5, 2021** (extended from March 26, 2021); and
- The motions shall be returnable on **April 12, 2021** (extended from April 1, 2021).

The reason for this second requested extension of time is that the undersigned, who is the primary brief writer in this matter, has been in quarantine with his wife and two young children without childcare since Thursday, February 11, 2021 and will continue to be in quarantine through at least February 20, 2021. With the limitations on both time and access to our office, its resources, and materials, plaintiffs will be unable to complete their opposition submission under the current scheduling Order and respectfully ask the Court to grant the very short extension outlined above.

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**Page 2**

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We thank Your Honor in advance for your anticipated attention and cooperation in this matter.

Respectfully submitted,

*/s/ Michael A. Rabasca*

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